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Description of document: Federal Financial Institutions Examination Council (FFIEC) records provided to Chairman Darrell Issa, House Oversight and Government Reform Committee, concerning the administration of the Freedom of Information Act (FOIA), 2011

Requested: 10-December-2011

Released date: 29-December-2011

Posted date: 12-March-2012

Source of document: FFIEC  
Attn: Executive Secretary  
3501 Fairfax Drive, Room B-7081a  
Arlington, VA, 22226-3550  
Fax: (703) 562-6446  
Email: [FOIA@ffiec.gov](mailto:FOIA@ffiec.gov)

Note: This is one of several files on the same subject for various agencies available on governmentattic.org. See: <http://www.governmentattic.org/5docs/chairmanIssa.htm>

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From: "Piccirilli, Rosanna L."  
Date: Dec 29, 2011 11:16:26 AM  
Subject: RE: FOIA request to FFIEC (FFIEC-011-030)

RESPONSEBY EMAIL ONLY

FFIEC FOIA Log No. FFIEC-011-030

The Federal Financial Institutions Examination Council (FFIEC) is in receipt of your email correspondence, pursuant to the provisions of the Freedom of Information Act (FOIA), 5 U.S.C. § 552. In your correspondence dated December 10, 2011, you request "an electronic copy of the records provided to the Honorable Chairman Darrell Issa" regarding his January 2011 FOIA inquiry to the FFIEC. Your FOIA request has been assigned a tracking number: FFIEC-011-030, please use this number to reference your request in the future.

The FOIA provides that federal agencies make their records promptly available to any person who makes a proper request for them. 5 U.S.C. § 552(a)(3)(A). Your request is granted and attached you will find the following three documents:

1. Request from Congressman Issa to the FFIEC dated January 25, 2011
2. Response letter from the FFIEC to Congressman Issa dated February 11, 2011
3. Attachment to the FFIEC letter—FFIEC 2010 Annual FOIA Report (as posted publicly on the FFIEC and Department of Justice Websites)

As your FOIA is granted we are closing our file on this matter. Thank you for your interest in the FFIEC.

Respectfully,

Judith Dupre, Executive Secretary, FFIEC

BY: Rosanna Piccirilli, FOIA Public Liaison

Rosanna Piccirilli  
Senior Program Coordinator, FFIEC  
rpiccirilli@fdic.gov  
703.516.5591  
[www.ffiec.gov](http://www.ffiec.gov)

ONE HUNDRED TWELFTH CONGRESS

# Congress of the United States

## House of Representatives

COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM

2157 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515-6143

Majority (202) 225-5074  
Minority (202) 225-5051

January 25, 2011

Paul Sanford  
Executive Secretary  
Federal Financial Institutions Examination Council  
3501 Fairfax Drive  
Room D-8073a  
Arlington, VA 22226-3550

Dear Mr. Sanford:

The Freedom of Information Act (“FOIA”) is one of the most important tools for government transparency and accountability. In their mission to find waste, fraud, and abuse, the oversight and investigative committees of Congress, including the Committee on Oversight and Government Reform (“Committee”), are often assisted by tips, complaints, and briefings from media organizations, watchdog groups, and concerned citizens. These private-sector actors are often the first to become aware of federal inefficiency or malfeasance. FOIA allows them to scrutinize the activities of federal agencies. Without FOIA, they could not hold the government accountable, nor could they provide crucial assistance to Congressional oversight. President Obama recognized the importance of FOIA when he made it the subject of an executive memorandum on his second day in office.<sup>1</sup>

The Committee, as the principal oversight committee in the House of Representatives with broad oversight jurisdiction as set forth in House Rule X, is very interested in ensuring that all federal agencies respond in a timely, substantive, and non-discriminatory manner to requests for information under FOIA. To enable the Committee to understand the impact of recent changes to FOIA procedures and to evaluate agencies’ compliance with FOIA, please provide the following information, records, and explanations by **February 15, 2011 at 5:00 pm**.

1. Provide your agency’s FOIA log(s) for the five years preceding the date of this letter, in Microsoft Excel or a similar format that allows sorting by column or information category, including at least the following information: (a) the name of the requestor; (b) the date of the request; (c) a brief description of the documents or records sought by the request; (d) any tracking number assigned to the request by your agency pursuant to

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<sup>1</sup> The White House, Memorandum for the Heads of Executive Departments and Agencies, Jan. 21, 2009, available at [http://www.whitehouse.gov/the\\_press\\_office/FreedomofInformationAct/](http://www.whitehouse.gov/the_press_office/FreedomofInformationAct/) (“[T]he Freedom of Information Act, which encourages accountability through transparency, is the most prominent expression of a profound national commitment to ensuring an open Government”).

Section 7 of the OPEN Government Act of 2007<sup>2</sup>; (e) the date the request was closed, if it is not still outstanding; (f) whether any records were provided in response to the request; and (g) any additional identification number or code assigned to the request by your agency for internal use.

2. On each log provided in response to Request No. 1, identify each FOIA request to your agency that was submitted more than 45 days prior to the date of this letter and to which your agency has not yet issued a complete and final response.

3. For each FOIA request identified in response to Request No. 2, provide all communications between your agency and the requestor.

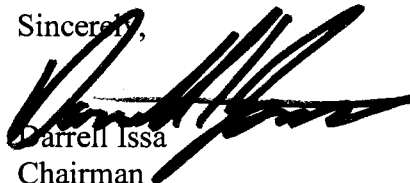
4. Identify any federal judicial action in which your agency, within the five years preceding the date of this letter, has been ordered by the court to pay any attorneys' fees or other litigation costs incurred by a FOIA requestor under 5 U.S.C. § 552(a)(4)(E) or under any similar law or regulation.

5. For each federal action identified in response to Request No. 4, provide a copy of the court order requiring your agency to pay attorney fees or other litigation costs.

Please note that for purposes of responding to this request, the terms "records," "communications," and "referring or relating" should be interpreted consistently with the attached Definitions of Terms.

Thank you for your prompt attention to this matter. If you have any questions regarding this request, please contact Hudson Hollister or Tegan Millspaw with the Committee staff at (202) 225-5074.

Sincerely,



Carrell Issa  
Chairman

cc: Hon. Elijah Cummings, Ranking Member, Committee on Oversight and Government Reform

David Ferriero, Archivist of the United States

Miriam Nisbet, Director, National Archives, Office of Government Information Services

Attachment

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<sup>2</sup> Pub. L. No. 110-175.

## **Definition of Terms**

1. The term "record" means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, interoffice and intra office communications, electronic mail (e-mail), contracts, cables, notations of any type of conversation, telephone call, meeting or other communication, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings and motion pictures), and electronic, mechanical, and electric records or representations of any kind (including, without limitation, tapes, cassettes, disks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape or otherwise. A record bearing any notation not a part of the original text is to be considered a separate record. A draft or non-identical copy is a separate record within the meaning of this term.
2. The term "communication" means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether face-to-face, in a meeting, by telephone, mail, telexes, discussions, releases, personal delivery, or otherwise.
3. The terms "referring or relating," with respect to any given subject, means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with or is in any manner whatsoever pertinent to that subject.

## Federal Financial Institutions Examination Council

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3501 Fairfax Drive • Room B7081a • Arlington, VA 22226-3550 • (703) 516-5588 • FAX (703) 562-6446 • [www.ffiec.gov](http://www.ffiec.gov)

February 11, 2011

The Honorable Darrell E. Issa  
House of Representatives  
Chairman, Committee on Oversight and Government Reform  
2157 Rayburn House Office Building  
Washington, DC 20515-6143

Dear Chairman Issa:

The Federal Financial Institutions Examination Council (FFIEC) is in receipt of your letter requesting Freedom of Information Act (FOIA) logs for the past five years. The FFIEC receives a limited number of FOIA requests, zero in FY08, two in FY09, and 24 in FY10; therefore the FFIEC does not presently have a FOIA log or electronic tracking system for the past five years of FOIA requests.

The FFIEC does not have full-time or part-time FOIA personnel. The Chief FOIA Officer for the FFIEC is the Executive Secretary, and the FFIEC FOIA Public Liaison is the Program Coordinator. Legal counsel for FFIEC FOIA requests is provided by the FFIEC's Legal Advisory Group. Since the data produced for FFIEC financial reports is "owned" by one of its five federal member agencies, legal counsel for that agency typically handles the research for FOIA requests for data their agency owns/manages/stores. As such, the FOIA professionals at each of the five federal member agencies implement their system for effective, timely, and accurate research and responses to FFIEC FOIA requests for their data.

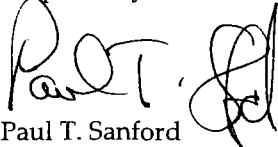
The Chief FOIA Officer and FOIA Public Liaison manage the research and response for data or information that is stored within the FFIEC's offices or website. As these requests are rare, they are a high priority as soon as they are received, appropriate steps are taken, and legal counsel is involved immediately if necessary. As a result, a response is made no later than by the date due according to the FFIEC FOIA regulation. There have been no backlogs or delays in responding to FOIA requests in FY09 or FY10, nor were there any administrative appeals or litigation resulting from FOIA requests to the FFIEC.

The FFIEC is fully versed in President Obama's FOIA Memorandum and the Attorney General's FOIA Guidelines, and has recently submitted both the Annual FOIA Report (final) and the Annual Chief FOIA Officer Report (draft) to the Department of Justice detailing the FFIEC's application of the presumption of openness and proactive disclosures throughout the last reporting year. Copies of these two reports are enclosed.

The Honorable Darrell E. Issa  
February 11, 2011  
Page 2

I trust you will find this summary and the enclosed reports to be responsive and thorough regarding the FFIEC's timely and nondiscriminatory manner for responding to all requests for information under the FOIA.

Respectfully,

A handwritten signature in black ink, appearing to read "Paul T. Sanford". The signature is stylized and somewhat cursive.

Paul T. Sanford  
Executive Secretary, FFIEC

Enclosures (2)

PTS:rlp

**Federal Financial Institutions Examination Council (FFIEC)  
Annual Freedom of Information Act Report  
Fiscal Year 2010**

(For the period 10/01/2009 through 09/30/2010)

**I. BASIC INFORMATION REGARDING THIS REPORT**

1. The FFIEC contact person for questions about this report is Paul T. Sanford, Executive Secretary, FFIEC, 3501 Fairfax Drive, Room B7081a, Arlington, VA, 22226-3550; telephone: (703) 516-5590, fax: (703) 562-6446.
2. This report is available on the FFIEC website at <http://www.ffiec.gov>.
3. A paper copy of this report may be obtained by downloading it from the FFIEC website or by requesting a copy from the Executive Secretary, FFIEC, 3501 Fairfax Drive, Room B7081a, Arlington, VA, 22226-3550; telephone: (703) 516-5590, fax: (703) 562-6446 or e-mail: [pasanford@fdic.gov](mailto:pasanford@fdic.gov).

**II. MAKING A FOIA REQUEST TO THE FFIEC**

1. All FOIA requests to the FFIEC must be in writing and directed to the FFIEC, Attn: Executive Secretary, 3501 Fairfax Drive, Room B7081a, Arlington, VA, 22226-3550. Requests may also be submitted electronically through the FFIEC's Electronic FOIA Office on the website at <http://www.ffiec.gov/foia.htm> using the email link provided: [FOIA@ffiec.gov](mailto:FOIA@ffiec.gov). The FFIEC's FOIA Guide is available on the FFIEC website at <http://www.ffiec.gov/foia.htm>.
2. Some FOIA requests are denied in whole or in part because the information requested is exempted from disclosure by the FOIA (5 U.S.C. §552 (b)). The exemptions most often applicable to information requested from the FFIEC include (b)(4), (b)(6) and (b)(8). The FFIEC receives a great deal of privileged and private financial information concerning individuals, businesses, and banking entities by virtue of its role as the interagency body empowered to prescribe uniform principles, standards, and report forms for the federal examination of financial institutions by the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), the National Credit Union Administration (NCUA), the Office of the Comptroller of the Currency (OCC), and the Office of Thrift Supervision (OTS), and to make recommendations to promote uniformity in the supervision of financial institutions. Exemptions (b)(4) and (b)(6) are invoked to withhold confidential or privileged material received by the FFIEC. The FFIEC invokes FOIA exemption (b)(8) to withhold financial institution examination reports and related information. Other exemptions may be used occasionally. In some cases, records cannot be located.



### III. ACRONYMS, DEFINITIONS, AND EXEMPTIONS

1. There are no FFIEC-specific acronyms or other terms used in this report.
2. Definition of terms used in this report:
  - a. **Administrative Appeal** – a request to a federal agency asking that it review at a higher administrative level a FOIA determination made by the agency at the initial request level.
  - b. **Average Number** – the number obtained by dividing the sum of a group of numbers by the quantity of numbers in the group. For example, of 3, 7, and 14, the average number is 8.
  - c. **Backlog** – the number of requests or administrative appeals that are pending at an agency at the end of the fiscal year that are beyond the statutory time period for a response.
  - d. **Component** – for agencies that process requests on a decentralized basis, a “component” is an entity, also sometimes referred to as an Office, Division, Bureau, Center, or Directorate, within the agency that processes FOIA requests.
  - e. **Consultation** – the procedure whereby the agency responding to a FOIA request first forwards a record to another agency for its review because that other agency has an interest in the document. Once the agency in receipt of the consultation finishes its review of the record, it responds back to the agency that forwarded it. That agency, in turn, will then respond to the FOIA requester.
  - f. **Exemption 3 Statute** – a federal statute that exempts information from disclosure and upon which the agency relies to withhold information under subsection (b)(3) of the FOIA.
  - g. **FOIA Request** – a FOIA request is generally a request to a federal agency for access to records concerning another person (i.e., a “third-party” request), or concerning an organization, or a particular topic of interest. FOIA requests also include requests made by requesters seeking records concerning themselves (i.e., “first-party” requests) when those requesters are not subject to the Privacy Act, such as non-U.S. citizens. Moreover, because all first-party requesters should be afforded the benefit of both the access provisions of the FOIA as well as those of the Privacy Act, FOIA requests also include any first-party requests where an agency determines that it must search beyond its Privacy Act “systems of records” or where a Privacy Act exemption applies, and the agency looks to FOIA to afford the greatest possible access. All requests which require the agency to utilize the FOIA in responding to the requester are included in this report. Additionally, a FOIA request includes records referred to the agency for processing and direct response to the requester. It does not, however, include records for which the agency has received a consultation from another agency. (Consultations are reported separately in Section XII

of this report.)

- h. **Full Grant** – an agency decision to disclose all records in full in response to a FOIA request.
- i. **Full Denial** – an agency decision not to release any records in response to a FOIA request because the records are exempt in their entireties under one or more of the FOIA exemptions, or because of a procedural reason, such as when no records could be located.
- j. **Median Number** – the middle, not average, number. For example, of 3, 7, and 14, the median number is 7.
- k. **Multi-Track Processing** – a system in which simple requests requiring relatively minimal review are placed in one processing track and more voluminous and complex requests are placed in one or more other tracks. Requests granted expedited processing are placed in yet another track. Requests in each track are processed on a first in/first out basis.
  - i. **Expedited Processing** – an agency will process a FOIA request on an expedited basis when a requester satisfies the requirements for expedited processing as set forth in the statute and in agency regulations.
  - ii. **Simple Request** – a FOIA request that an agency using multi-track processing places in its fastest (non-expedited) track based on the low volume and/or simplicity of the records requested.
  - iii. **Complex Request** – a FOIA request that an agency using multi-track processing places in a slower track based on the high volume and/or complexity of the records requested.
- l. **Partial Grant/Partial Denial** – in response to a FOIA request, an agency decision to disclose portions of the records and to withhold other portions that are exempt under the FOIA, or to otherwise deny a portion of the request for a procedural reason.
- m. **Pending Request or Pending Administrative Appeal** – a request or administrative appeal for which an agency has not taken final action in all respects.
- n. **Perfect Request** – a request for records which reasonably describes such records and is made in accordance with published rules stating the time, place, fees (if any) and procedures to be followed.
- o. **Processed Request or Processed Administrative Appeal** – a request or administrative appeal for which an agency has taken final action in all respects.
- p. **Range in Number of Days** – the lowest and highest number of days to process requests

or administrative appeals.

q. **Time Limits** – the time period in the statute for an agency to respond to a FOIA request (ordinarily twenty working days from receipt of a perfected FOIA request).

3. Concise descriptions of the nine FOIA exemptions:

a. **Exemption 1:** classified national defense and foreign relations information.

b. **Exemption 2:** internal agency rules and practices.

c. **Exemption 3:** information that is prohibited from disclosure by another federal law.

d. **Exemption 4:** trade secrets and other confidential business information.

e. **Exemption 5:** inter-agency or intra-agency communications that are protected by legal privileges.

f. **Exemption 6:** information involving matters of personal privacy.

g. **Exemption 7:** records or information compiled for law enforcement purposes, to the extent that the production of those records (A) could reasonably be expected to interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions, or (F) could reasonably be expected to endanger the life or physical safety of any individual.

h. **Exemption 8:** information relating to the supervision of financial institutions.

i. **Exemption 9:** geological information on wells.

#### IV. EXEMPTION 3 STATUTES

A. Exemption 3 Statutes Relied upon to Withhold Information

Statute	Type of Information Withheld	Supporting Case Citation	Total Number of Times Relied upon by FFIEC
-0-	-0-	-0-	-0-

## V. FOIA REQUESTS

### A. Received, Processed and Pending FOIA Requests (both perfected and non-perfected)

Number of Requests Pending as of the Start of the Fiscal Year	Number of Requests Received in the Fiscal Year	Number of Requests Processed in the Fiscal Year	Number of Requests Pending as of the End of the Fiscal Year
-0-	-24-	-24-	-0-

### B.(1) Disposition of FOIA Requests – All Processed Requests

Full Grant	Partial Grant Partial Denial	Full Denial Based on Exemption	Full Denial No Records	Full Denial Records Referred to Another Agency	Full Denial Request Withdrn	Full Denial Fee Related	Full Denial Records not Reasonably Described	Full Denial Improper FOIA Request	Full Denial Not Agency Record	Full Denial Dup. Req.	Full Denial Other see <u>B.(2) below</u>	FFIEC Total
-3-	-2-	-1-	-4-	-9-	-0-	-0-	-0-	-2-	-3-	-0-	-0-	-24-

### B.(2) Disposition of FOIA Requests – “Other” Reasons for “Full Denials Based on Reasons Other than Exemptions” from Section VB(1) Chart

Description of “Other” Reasons for Denials from Chart B(1) & Number of Times Those Reasons Were Relied Upon	Total
N/A	-0-

### B.(3) Disposition of FOIA Requests – Number of Times Exemptions Applied

Ex. 1	Ex. 2	Ex. 3	Ex. 4	Ex. 5	Ex. 6	Ex. 7(A)	Ex. 7(B)	Ex. 7(c)	Ex. 7(D)	Ex. 7(E)	Ex. 7(F)	Ex. 8	Ex. 9
-0-	-0-	-0-	-1-	-0-	-1-	-0-	-0-	-0-	-0-	-0-	-0-	-1-	-0-

## VI. APPEALS OF INITIAL DETERMINATIONS OF FOIA REQUESTS

### A. Received, Processed and Pending Administrative Appeals

Number of Appeals Pending as of the Start of the Fiscal Year	Number of Appeals Received in the Fiscal Year	Number of Appeals Processed in the Fiscal Year	Number of Appeals Pending as of the End of the Fiscal Year
-0-	-0-	-0-	-0-

B. Disposition of Administrative Appeals – All Processed Appeals

Number Affirmed on Appeal	Number Partially Affirmed & Partially Reversed or Remanded	Number Completely Reversed or Remanded on Appeal	Number of Appeals Closed for Other Reasons	TOTAL
-0-	-0-	-0-	-0-	-0-

C.(1) Reasons for Denial on Appeal – Number of Times Exemptions Applied

Ex. 1	Ex. 2	Ex. 3	Ex. 4	Ex. 5	Ex. 6	Ex. 7(A)	Ex. 7(B)	Ex. 7(C)	Ex. 7(D)	Ex. 7(E)	Ex. 7(F)	Ex. 8	Ex. 9
-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-

C.(2) Reasons for Denial on Appeal – Reasons Other than Exemptions

No Records	Records Referred at Initial Request	Request Withdrawn	Fee Related Reason	Records not Reasonably Described	Improper Request for Other Reasons	Not Agency Record	Duplicate Request or Appeal	Request in Litigation	Denial of Request for Expedited Processing	Other see C.(3) below
-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-

C.(3) Reasons for Denial on Appeal – “Other” Reasons from Section VI,C(2) Chart

Description of “Other” Reasons for Denial on Appeal from Chart C(2) & Number of Times Those Reasons Were Relied Upon	Total
N/A	-0-

C.(4) Response Time for Administrative Appeals

Median Number of Days	Average Number of Days	Lowest Number of Days	Highest Number of Days
-0-	-0-	-0-	-0-

C.(5) Ten Oldest Pending Administrative Appeals

	10 <sup>th</sup>	9 <sup>th</sup>	8 <sup>th</sup>	7 <sup>th</sup>	6 <sup>th</sup>	5 <sup>th</sup>	4 <sup>th</sup>	3 <sup>rd</sup>	2 <sup>nd</sup>	Oldest Appeal
Date Received	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-
Number of Days Pending	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-

## VII. RESPONSE TIME FOR PROCESSED AND PENDING FOIA REQUESTS

### A. Processed Requests – Response Time for All Processed Perfected Requests

Simple				Complex				Expedited Processing			
Median Number of Days	Average Number of Days	Lowest Number of Days	Highest Number of Days	Median Number of Days	Average Number of Days	Lowest Number of Days	Highest Number of Days	Median Number of Days	Average Number of Days	Lowest Number of Days	Highest Number of Days
-4-	-4.15-	-1-	-11-	-20-	-20-	-16-	-24-	N/A	N/A	N/A	N/A

### B. Processed Requests – Response Time for Perfected Requests Where Information Granted

Simple				Complex				Expedited Processing			
Median Number of Days	Average Number of Days	Lowest Number of Days	Highest Number of Days	Median Number of Days	Average Number of Days	Lowest Number of Days	Highest Number of Days	Median Number of Days	Average Number of Days	Lowest Number of Days	Highest Number of Days
-6-	-7.7-	-6-	-11-	-20-	-20-	-16-	-24-	N/A	N/A	N/A	N/A

### C. Processed Requests – Response Time in Day Increments

#### Simple Requests

1 - 20 Days	21 - 40 Days	41 - 60 Days	61 - 80 Days	81 - 100 Days	101 - 120 Days	121 - 140 Days	141 - 160 Days	161 - 180 Days	181 - 200 Days	201 - 300 Days	301 - 400 Days	401 + Days	FFIEC Total
-22-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-22-

#### Complex Requests

1 - 20 Days	21 - 40 Days	41 - 60 Days	61 - 80 Days	81 - 100 Days	101 - 120 Days	121 - 140 Days	141 - 160 Days	161 - 180 Days	181 - 200 Days	201 - 300 Days	301 - 400 Days	401 + Days	FFIEC Total
-1-	-1-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-2-

#### Requests Granted Expedited Processing

1 - 20 Days	21 - 40 Days	41 - 60 Days	61 - 80 Days	81 - 100 Days	101 - 120 Days	121 - 140 Days	141 - 160 Days	161 - 180 Days	181 - 200 Days	201 - 300 Days	301 - 400 Days	401 + Days	FFIEC Total
-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-

### D. Pending Requests – All Pending Perfected Requests

Simple			Complex			Expedited Processing		
Number Pending	Median Number of Days	Average Number of Days	Number Pending	Median Number of Days	Average Number of Days	Number Pending	Median Number of Days	Average Number of Days
-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-

E. Pending Requests – Ten Oldest Pending Perfected Requests

	10 <sup>th</sup>	9 <sup>th</sup>	8 <sup>th</sup>	7 <sup>th</sup>	6 <sup>th</sup>	5 <sup>th</sup>	4 <sup>th</sup>	3 <sup>rd</sup>	2 <sup>nd</sup>	Oldest Request
Date Received	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-
Number of Days Pending	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-

**VIII. REQUESTS FOR EXPEDITED PROCESSING AND REQUESTS FOR FEE WAIVER**

A. Requests For Expedited Processing

Number Granted	Number Denied	Median Number of Days to Adjudicate	Average Number of Days to Adjudicate	Number Adjudicated Within Ten Calendar Days
-0-	-0-	-0-	-0-	-0-

B. Requests for Fee Waiver

Number Granted	Number Denied	Median Number of Days to Adjudicate	Average Number of Days to Adjudicate
-0-	-0-	-0-	-0-

**IX. FOIA PERSONNEL AND COSTS**

Personnel			Costs		
Number of "Full-Time FOIA Employees"	Number of "Equivalent Full-Time FOIA Employees"	Total Number of "Full-Time FOIA Staff"	Processing Costs	Litigation Related Costs	Total Costs
-0-	-0.02-	-0-	-\$7600.-	-0-	-0-

**X. FEES COLLECTED FOR PROCESSING REQUESTS**

Total Amount of Fees Collected	Percentage of Total Costs
-0-	NA

## XI. FOIA REGULATIONS AND FEE SCHEDULE

The FFIEC FOIA regulations are found at 12 CFR § 1101.4 and are available at <http://www.ffiec.gov/foia.htm>.

## XII. BACKLOGS, CONSULTATIONS, AND COMPARISONS

### A. Backlogs of FOIA Requests and Administrative Appeals

Number of Backlogged <u>Requests</u> as of the End of the Fiscal Year	Number of Backlogged <u>Appeals</u> as of the End of the Fiscal Year
-0-	-0-

### B. Consultations on FOIA Requests – Received, Processed, and Pending Consultations

Number of Consultations Received from Other Agencies that Were <u>Pending</u> as of the <u>Start</u> of the Fiscal Year	Number of Consultations <u>Received</u> from Other Agencies During the Fiscal Year	Number of Consultations Received from Other Agencies that Were <u>Processed</u> During the Fiscal Year	Number of Consultations Received from Other Agencies that Were <u>Pending</u> at Your Agency as of the <u>End</u> of the Fiscal Year
-0-	-0-	-0-	-0-

### C. Consultations on FOIA Requests – Ten Oldest Consultations Received from Other Agencies and Pending

	10 <sup>th</sup>	9 <sup>th</sup>	8 <sup>th</sup>	7 <sup>th</sup>	6 <sup>th</sup>	5 <sup>th</sup>	4 <sup>th</sup>	3 <sup>rd</sup>	2 <sup>nd</sup>	Oldest Consultation
<b>Date Received</b>	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-
<b>Number of Days Pending</b>	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-	-0-

### D. Comparison of Numbers of Requests from Previous and Current Annual Report – Requests Received, Processed, and Backlogged

<u>Number of Requests Received</u>		<u>Number of Requests Processed</u>	
Number Received During Fiscal Year from Last Year's Annual Report	Number Received During Fiscal Year from Current Annual Report	Number Processed During Fiscal Year from Last Year's Annual Report	Number Processed During Fiscal Year from Current Annual Report
-2-	-24-	-2-	-24-



**Number of Requests Backlogged**

<b>Number of Backlogged Requests as of the End of the Fiscal Year from the <u>Previous Annual Report</u></b>	<b>Number of Backlogged Requests as of the End of the Fiscal Year from the <u>Current Annual Report</u></b>
-0-	-0-

E. Comparison of Numbers of Appeals from Previous and Current Annual Report – Appeals Received, Processed, and Backlogged

**Number of Appeals Received**

**Number of Appeals Processed**

<b>Number Received During Fiscal Year from Last Year's Annual Report</b>	<b>Number Received During Fiscal Year from Current Annual Report</b>	<b>Number Processed During Fiscal Year from Last Year's Annual Report</b>	<b>Number Processed During Fiscal Year from Current Annual Report</b>
-0-	-0-	-0-	-0-

<b>Number of Backlogged Appeals as of the End of the Fiscal Year from the <u>Previous Annual Report</u></b>	<b>Number of Backlogged Appeals as of the End of the Fiscal Year from the <u>Current Annual Report</u></b>
-0-	-0-